

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

SHERRONA TAYLOR,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:24-cv-01008-STA-jay
)	
SIMON & SCHUSTER, INC. and SIMON &)	JURY DEMAND
SCHUSTER, LLC,)	
)	
<i>Defendants.</i>)	

**UNOPPOSED MOTION TO
CONTINUE SCHEDULING DEADLINES AND TRIAL DATE**

Plaintiff Sherrona Taylor (“Ms. Taylor” or “Plaintiff”) respectfully submits this Unopposed Motion to Continue Scheduling Deadlines.

The current deadline to complete all discovery is February 14, 2024. [D.E. 32 at PageID 104]. Plaintiff filed a Motion to Compel on December 15, 2024, which is pending with the Court. [D.E. 38]. As detailed in that Motion, Defendant asserts that it does not have certain documents related to Plaintiff’s employment (such as payroll records and investigative files), and that Paramount Global (Simon & Schuster’s former owner) may have those documents. [D.E. 38-1 at PageID 154].

Plaintiff served a subpoena to Paramount Global for deposition testimony to obtain clarification on these issues, so that Plaintiff could then send a narrowly tailored subpoena duces tecum to Paramount Global. [D.E. 38-1 at PageID 158]. Paramount Global refused to appear for its deposition, forcing Plaintiff to file a Motion to Compel in the Southern District of New York. [D.E. 44 at PageID 332]. The Court in the Southern District of New York ordered Paramount to appear for a deposition; however, as of today’s date, Paramount has failed to agree to a date for its

deposition. These actions by Paramount Global have further delayed efficient and timely discovery in this case. Ms. Taylor therefore anticipates needing additional time to complete discovery after resolution of both the Motion to Compel in this case and the dispute in the Southern District of New York.

Additionally, throughout the last several months, Ms. Taylor has learned facts establishing that Paramount Global and Simon & Schuster were so interrelated that they should be treated as a “single employer” for purposes of her employment discrimination claims. Plaintiff therefore plans to file a Motion to Amend to add Paramount Global as a defendant in this case.

For the foregoing reasons, Plaintiff respectfully seeks an extension of the current deadlines in this case:

Event	Current Deadline	Requested New Deadline
Motion to Amend	July 1, 2024	January 31, 2025
Deadline to complete all discovery	February 14, 2025	June 13, 2025
Rule 26(e)(1) supplementation deadline	February 14, 2025	June 14, 2025
Motion to exclude experts / <i>Daubert</i> motion deadline	March 14, 2025	July 14, 2025
Dispositive motion deadline	March 21, 2025	July 21, 2025

Because the jury trial of this case is currently scheduled for July 21, 2025, Ms. Taylor also respectfully requests the Court continue to trial date to allow for pre-trial resolution of any dispositive motions that may be filed in this case. Additionally, Plaintiff’s counsel has a jury trial that is scheduled to begin on July 22, 2025 in the Middle District of Tennessee. Both Plaintiff’s counsel represent five plaintiffs in that case, and the trial is expected to last for 3.5 weeks. The case (*Hayes et al. v. Metropolitan Government of Nashville & Davidson County*, Case No. 3:20-cv-01023) has been pending since 2020 and Plaintiff’s counsel does not anticipate the trial will be rescheduled or cancelled. Plaintiff therefore respectfully requests the jury trial be scheduled for a date after September 22, 2025.

Dated: January 23, 2025

Respectfully submitted,

STEINER & STEINER, LLC

/s/ Ann Buntin Steiner by JFH w/ permission

Ann Buntin Steiner, BPR No. 011697
613 Woodland Street
Nashville, Tennessee 37206
(615) 244-5063
asteiner@steinerandsteiner.com

JESSE HARBISON LAW PLLC

/s/ Jesse Ford Harbison

Jesse Ford Harbison, BPR No. 032105
P.O. Box 68251
Nashville, Tennessee 37206
(629) 201-7284
jesse@jesseharbisonlaw.com

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), Jesse Ford Harbison, counsel for Plaintiff, conferred with Matthew G. Gallagher, counsel for Defendant, via email on January 23, 2025 regarding the relief requested in this Motion, and counsel for Defendant does not oppose the motion.

/s/ Jesse Ford Harbison

Jesse Ford Harbison

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicating on the electronic filing receipt as follows: Matthew G. Gallagher, Taylor D. Lawson, Littler Mendelson, P.C., One Commerce Square, 40 South Main Street, Suite 2500, Memphis, TN 38103. Parties may access this filing through the Court's electronic filing system.

/s/ Jesse Ford Harbison

Jesse Ford Harbison